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June 8, 2007

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**VIA HAND-DELIVERY**

The Honorable Charles L.A. Terreni  
Chief Clerk / Administrator  
**Public Service Commission of South Carolina**  
101 Executive Center Drive  
Columbia, South Carolina 29211

RE: Application of Act of Class Relocation, Incorporated for a Class E (Household Goods) Certificate of Public Convenience and Necessity for the Operation of a Motor Vehicle Carrier; Docket No. 2007-97-T

Dear Mr. Terreni:

On May 30, 2007, our offices received a Petition to Intervene filed on behalf of Roeder & Moore, LLC, d/b/a Two Men and a Truck of Charlotte & Two Men and a Truck of Rock Hill ("Two Men and a Truck") in the above referenced docket. Therein, the Petitioner asserts that it "is a household goods provider authorized by the Commission to transport household goods between points and places in South Carolina" and "holds a Class E Certificate of Public Convenience and Necessity" granted in Docket No. 2001-221-T.

The Applicant, Act of Class Relocation, Inc. ("Act of Class"), is aware that the South Carolina Office of Regulatory Staff ("ORS") has filed a Motion For Immediate Suspension of Certificate of Public Convenience and Necessity held by Two Men and a Truck. *See* Docket No. 2001-221-T. ORS asserts therein that Two Men and a Truck has failed to file the requisite proof of insurance and that "continued operation of Two Men and a Truck without any form of insurance is contrary to the public interest." ORS further requests that the Commission suspend the Certificate of Public Convenience and Necessity currently held by Two Men and a Truck "until such time as the carrier evidences that it has complied with the insurance requirements of this Commission or the carriers certificate of public convenience and necessity has been permanently revoked."

Act of Class does not oppose the Petition to Intervene at this time; however, because of the issues raised in Docket No. 2001-221-T, the Applicant reserves the right to challenge the

(Continued . . .)

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standing of Two Men and a Truck to intervene in this matter pending the outcome of ORS's motion.

I am serving a copy of this document upon the Office of Regulatory Staff and the other party in this matter and enclose a Certificate of Service to that effect. I would appreciate your acknowledging receipt of this document by date-stamping the extra copy that is enclosed and returning it to me via our courier.

If you have any questions or if you need any additional information, please do not hesitate to contact us.

Sincerely,

**WILLOUGHBY & HOEFER, P.A.**

A handwritten signature in black ink, appearing to read "Benjamin P. Mustian", with a long horizontal flourish extending to the right.

Benjamin P. Mustian


cc: C. Lessie Hammonds, Esquire  
John J. Pringle, Jr., Esquire

100-443886-100

Application of Act of Class )  
Relocation, Inc. for a Class E )  
Household Goods Certificate of )  
Public Convenience And Necessity )  
for Operation of Motor Vehicle )  
Carrier. )  
\_\_\_\_\_ )

This is to certify that I have caused to be served this day one (1) copy of the **Return to Petition to Intervene** by placing same in the care and custody of the United States Postal Service with first class postage affixed thereto and addressed as follows:

John J. Pringle, Jr., Esquire  
1501 Main Street, Fifth Floor  
P.O. Box 2285  
Columbia, South Carolina 29202

  
Jennifer Cromer

Columbia, South Carolina  
This 8<sup>th</sup> day of June, 2007.